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Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) to correct a misstatement in Plaintiffs’ January 9, 2024 letter (ECF No. 9517) opposing Saudi Arabia’s request for an extension of time to provide proposed redactions.

Plaintiffs inaccurately state that “during the parties’ meet and confer, Saudi Arabia agreed that a 30-day redaction turnaround and subsequent filing on the public docket would apply to Plaintiffs’ December . . . filings irrespective of defendants’ motion[] to strike.” In the meet-and-confer discussions concerning Saudi Arabia’s motion to strike, counsel for Saudi Arabia made no such statement. In the separate meet-and-confer preceding Saudi Arabia’s January 8 letter-motion, Saudi Arabia specifically proposed to extend the redaction deadline. *See Ex. A.*

An extension of the proposed redaction deadline is necessary given the extraordinary length of Plaintiffs’ Averment of Facts, which far exceeds what Saudi Arabia anticipated when it agreed last year to a 30-day redaction turnaround. Saudi Arabia should not be required to divert attention from its substantive reply to propose redactions to Plaintiffs’ excessive filings.

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)